

(Comments in Bold Italics by L. Johnston to consultants for preparation of Specific Plan/EIR/EA. Note that the applicants have submitted a proposed Specific Plan – consultant is to utilize information from the submittal to create a Specific Plan for the County)

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Preliminary Public Comment: Concerns Regarding the June
Lake Rodeo Ground Development Proposal

The proposed Intrawest development for the Rodeo Grounds in the June Lake Loop will be opposed in the form of legal, political, and voter action unless the deficiencies below are corrected:

1) The Specific Plan must comply with state and local regulations:

a) It must be consistent with the County General Plan, the June Lake Area Plan and the June Lake Design Guidelines

The proposal is out of compliance because it requires a General Plan amendment, building heights exceed the allowable limit, it does not state density (PAOT) specifically, and it claims precedence over the General Plan. It is consequently in violation of state code and the General Plan, both of which require development to be consistent with the County General Plan.

(The applicants have applied for a General Plan Amendment to allow up to 90', which is their right to apply. Rough estimates of population were presented at the scoping meeting: 2500 plus or minus. Consultant should provide detail calculations of population density in SP/EIR.)

b). The language "In the case of a conflict between this Specific Plan and the Mono County General Plan, this Specific Plan shall prevail" must be deleted:

- This language violates government code 65300, et.seq., establishing the County General Plan as the supreme document governing development within the county;
- This language contradicts the County General Plan, which states that said plan is the supreme document governing development within the county, and that any development proposal must be consistent with said general plan;
- This language renders the proposal in conflict with the June Lake Design Guidelines, which were developed by the citizens of June Lake as the governing guidelines for development within the June Lake Loop. =
- This language renders the plan internally inconsistent since it also states repeatedly that it conforms to the General Plan.

(see note above. What applicants want in terms of height is not now consistent with the General Plan / Area Plan; thus they have applied to change it. The SP/GPA/EIR/EA would be concurrently processed and if approved there would be no inconsistency.)

c) Building heights exceed the capabilities of the local Fire Protection District (one of the main issues – consultant to analyze)

d) It must have internal consistency, as required by government code 65300, et.seq., and the County General Plan. **(see note above)**

e) The developer must remove the "Transfer of Densities" language in section 5.1.1 of the Specific Plan; the developer shall follow the legal densities as outlined in the Local Area Plan. **(applicant can request this in SP; consultant should analyze)**

2) The proposal must make a clear, definite, and accurate statement of density in terms of People at One Time (P AOT), which shall not exceed that allowed by the June Lake Area Plan. The average and maximum P AOT must be stated and known in order to provide for:

- . Completion of a valid EIR;
- . Consistency with the June Lake Area Plan and the County General Plan;
- . Correct calculations of water usage;
- . Accurate estimates of sewage flow;
- . Development of a plan for adequate traffic circulation throughout the Loop;
- . Adequate parking for the correct number of PAOT according to the General Plan and the Area Plan;
- . Assessment of impacts on public safety issues, e.g., police and fire protection;
- . Assessment of impacts on environment and wildlife.

(see note above)

3) Building parameters must be consistent with the General Plan and Area Plan. **(see note above)**

a) Building dimensions throughout the development area must be specified and consistent with the General Plan

The dimensions in the submitted Specific Plan are out of compliance because:

- . Building heights exceed those allowed by the June Lake Area Plan, the County General Plan, and the June Lake Design Guidelines;
- . Building heights exceed the capability of the local fire protection district;
- . Building heights and masses do not fit the mountain village character of June Lake or the unique mountain character of the June Lake Loop;
- . Specific setbacks are not stated when buildings exceed the 35 foot limit height throughout the development area.

(see note above)

b) Building types must fit the unique mountain character of the June Lake Loop and be in compliance with June Lake Community Design Guideline **(peer design review is one of the consultant tasks in RFP)**

4) Housing issues must be resolved.

Considering the trend that the rising property values associated with resort development drive families out of communities, and that there is already a shortage of housing for Intrust employees in June Lake:

- . The projected number of employees that will be needed must be specified;
- . Housing for 100% of employees must be incorporated.
- . Employee housing must be specified and located;
- . The Affordable Housing units included in the specific plan must be built and managed on the model of Mammoth Lakes Housing, Inc with mixed use apartments and condos, adjusted income, and deed restricted units available to encourage families to stay in June Lake.

(employment, housing, affordable housing, population must be analyzed by consultant)

5) Infrastructure issues must be resolved.

a) Sewage treatment

. Adequacy of sewage treatment should be calculated in the context of build out for the entire loop, not at current usage, and the developer must pay for any required sewage improvements. The PAOT must be known in order to accurately calculate impact on the sewage treatment plant;

- . Language stating that developer will have no impact and will not increase costs relating to sewage treatment must be deleted.

(analysis to include above; note County can not impose a fee on PUD, if needed; PUD would be responsible agency – consultation with PUD for water and sewer requirements)

b) Fire protection

- . June Lake Fire Protection district averages 2.7 people per structure fire call, and 4 people on other calls, which is inadequate staff/firefighters for such a large development. The department is already losing personnel due to rising housing prices, and this trend will be amplified by Intrawest's development;
- . The proposed building heights exceed the capabilities of equipment available to the local fire protection district;
- . The developer must be responsible for increased cost of training personnel to fight structure fires in the large buildings in the proposal;
- . The developer must be responsible for supplying equipment capable of fighting fires in the proposed large buildings;
- . The developer must be responsible for building any additional fire stations determined to be needed;
- . The developer must specify a source of water and adequate pressure should it become necessary to fight a fire on the premises.

(include analysis; note County can not impose fees for FD; consultation with FD essential)

c) Snow storage and removal

- . The plan must specify sufficient road widths and adequate setbacks for snow removal and storage throughout the area covered in the development proposal;
- . Developer must demonstrate it has secured off-site snow storage for snow removed from the development area.

(important issue, especially if they are public roads. explore alternative snow removal options for various parts of the plan, e.g., snow melt systems?)

d) New electrical distribution and substation facilities

- . Location must be specified within the designated area;
- . An EIR must specifically address the substation and its site;
- . The developer must be responsible for the cost.

(SCE to be contacted; SCE maintains a 3-acre site for a substation within the SP)

e) Increased costs of services

- . The developer must assume responsibility for increased cost of paramedic services, fire fighting, police protection, and a larger Public Utility District staff;
- . The developer must pay for an economic impact study to determine that long-term costs to the County to provide services do not exceed revenue from the overall development area.

(a financial analysis will be prepared, paid by applicants – part of study process.)

f) The potential increase in population must be addressed:

- . A daycare center must be sited within the development area;
- . A clinic or medical services must be sited within the development area;
- . A police substation must be sited within the development area;
- . A library facility suited to the increased population must be sited within the development area;
- . Mitigation funds must be designated to the Eastern Sierra Unified School district;

(include in analysis)

- j) *Water storage will be built on the developer's property at the developer's expense (water storage is proposed on FS lands; other existing PUD storage is located on FS lands; thus the EA. On site storage might be an alternative but should be reviewed via PUD to see if it's even feasible)*

6) Effect on the local economy must be addressed:

- . The designated retail space at the Rodeo Grounds must not be larger than the total retail space in the June Lake Village area;
- . A mechanism must be in place to ensure that mitigation funds return to the June Lake Loop;
- . A study must be done proving that the separate retail area will complement the Village rather than compete with it;
- . Development alternatives such as purchasing and redeveloping property in the Village in conjunction with the Rodeo Grounds must be considered;

(see note above; financial analysis is included)

7) The Developer's "Rodeo Grounds Design Guidelines" must be discarded:

The developer will follow the June Lake Design Guidelines, which were written to govern development throughout the Loop, including the Specific Plan area

- . The development will not be designed or intended to act as a separate community or commercial center, but will complement and extend the current Village and its character;
- . The June Lake Design Guidelines are the product of much concerted work and effort by June Lake Citizens and represent how we wish development to proceed;
- . The June Lake Design Guidelines specifically intended to avoid the type of 'cookie cutter' uniform development planned by the developer, to avoid development of a geographically separate resort and commercial area, and to preserve the unique mountain character of June Lake.

(developer has a right to propose guidelines; as noted above, peer design review is one of the consultant tasks in RFP – it will compare proposal against JL Guidelines)

8) The Development EIR must be consistent with:

- . The latest County General Plan EIR;
- . The latest June Lake Area Plan EIR;

(There no "consistency" requirement for EIRs; EIRs must follow CEQA)

9) A comprehensive hydrological survey must be completed by a licensed hydrology engineering firm:

- . To measure aquifer/drainage storage capacity, especially considering the recent warm and dry climatic trends, which both reduce storage capacity;
- . To ensure lake levels are maintained;
- . To ensure stream levels are maintained;
- . Specific P AOT must be stated to accurately calculate usage;
- . Development impacts must be considered in the context of build out, not current usage;
- . Developer must submit, pay for, and maintain a system whereby reclaimed water is used to irrigate the site;

- . Developer must submit, pay for, and develop a storm water retention plan that considers, specifies, and remedies impacts based on a one hour/100 year event.

(CEQA does not mandate licensed engineers; however, consultants should include best analysis for water issues, which is likely to have a licensed engineer. Comments above should be considered in evaluation. 100 year storm is not County standard; consult public works/ water board)

10) Environmental impacts must be addressed.

a) Consistency must be maintained with County Scenic Highway guidelines and with preservation of scenic value as specified in the General Plan:

- . Gondola lines should not cross the highway;
- . Increased noise, air, and light pollution will conflict with scenic designation;
- . Oversized buildings of excessive bulk will conflict with scenic designation;
- . Dust and steam plumes from building mechanical will create adverse visual impacts;
- . Sufficient open space must be maintained in consistency with scenic highway designation;
- . Building architecture, siting, and overall project design must be congruous in scale and compatible with the surrounding community and natural environment;
- . Building design and scale shall not detract from the natural attractiveness of the community or its surroundings;
- . A plan to demonstrate that areas disturbed by construction will be rehabilitated to their natural state must be in place;
- . The proper Federal, State, and County agencies must be consulted to ensure compliance with Scenic Highway/Corridor designation.

(Visual analysis to include computer simulations, and consider items noted above. Federal and state agencies do not have jurisdiction over County Scenic Highway designation. They can comment on visual analysis if they wish)

b) A valid EIR must also address impacts on the land and water

- How will runoff from paved areas and increased use of de-icing material affect silting down canyon, fish stocks, and fishing?
- There needs to be a discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or urban pollutants on streams and water courses on or near the project site, with mitigation measures proposed to alleviate such impacts;
- . The storm water management plan must be up to date and adequate to manage a one hour/100 year event.

(include in analysis)

c) Impacts on the air

Will air quality suffer:

- . From increased traffic/vehicle emissions;
- . From increased fireplace/stove usage;
- . From increased use of de-icing materials on roadways;
- . Will an air quality monitor be needed? Developer will pay if needed.

(include in analysis)

d) Impacts on flora and fauna

- . Impact on the deer migration route and fawning areas directly within the Rodeo Grounds area. ,

- . Impact on deer crossings and holding areas from increased traffic in the north segment of the June Lake Loop;
- . Impact on Mono milk vetch and other plants growing in the Loop that have been identified as rare, threatened, or endangered in California.
- . Effect of removal of trees and increased density of residents on bird habitat and nesting areas;
- . Effect of the development on local coyote populations;
- . Effect on the endangered sage grouse;
- . Effect on the endangered Swainson's hawk;
- . Effect on the endangered northern goshawk;
- . Effect on the endangered willow flycatcher;
- . Effect on the endangered prairie falcon;
- . Effect on the listed pine marten;
- . Effect of the development on the local bald eagle population;
- . Projections of increased roadkill due to increased traffic and what potential impact it will have on animal populations throughout the Loop;
- . An analysis of possible wildlife-human conflicts and mitigation measures to reduce these conflicts associated with development projects or other uses nearby or adjacent to natural areas such as the Rodeo Grounds Meadow and nearby wetlands.

(include in analysis)

11) There must be a full and comprehensive traffic study with mitigation for impacts to SR 158 and other arterials.

- The plan must be designed in the context of build out, not current population;
- Improvements to existing roads may be needed throughout the Loop;
- Placement of traffic lights and sidewalks may be needed in the Village;
- The larger PAOT will cause circulation and parking problems throughout the Loop;
- . Increases in road maintenance costs;
- . Impact of increased traffic on pedestrian safety throughout the Loop;
- . Emergency evacuation plans in case of natural disaster such as earthquake, based on the increased population;
- . Assumption of traffic-related infrastructure costs by the developer.

(traffic consultant to consider)

12) Impacts of construction must be assessed and remedied

- . Noise;
- . Runoff;
- . Large-truck traffic;
- . Lack of construction worker housing;
- . Increased construction worker traffic;
- . Increased need for law enforcement due to added construction worker presence;
- . Heavy equipment operation.

(include in analysis)

13) Notice of public meetings regarding this development must be given to all interested citizens, state, and county agencies, including but not limited to:

- . California Department of Fish and Game;
- . Caltrans;
- . Lahontan Regional Water Quality Control Board;
- . June Lake Public Utility District;
- . June Lake Fire Protection District;

- . Property owners;
- . June Lake Post Office boxholders.

(CEQA does not require public hearings; applications do. County has wide distribution list, including agency list, state clearinghouse, etc. – next public hearing will likely be after Draft documents are released.)

14) Comments by all interested state and county agencies must be incorporated in the development process. ***(SOP)***

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(good scoping comments, please consider carefully)